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**LAS VEGAS DEVELOPMENT GROUP, LLC**  
7

8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA  
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11 \*\*\*

12 LAS VEGAS DEVELOPMENT GROUP, LLC, )  
a Nevada limited liability company, )

13 Plaintiff, )

Case No. 2:16-cv-00038-RFB-GWF

14 vs. )

15 STEVEN P. SCHNEIDER, an individual; )  
NATIONSTAR MORTGAGE, LLC, a )  
16 Delaware limited liability company; AZTEC )  
FORECLOSURE CORPORATION, a )  
17 California corporation; TRACY BURR, an )  
individual; FEDERAL NATIONAL )  
18 MORTGAGE ASSOCIATION, a federally )  
chartered corporation; EVERGREEN )  
19 MONEYSOURCE MORTGAGE COMPANY, )  
a Washington corporation; DOE individuals I )  
20 through XX; and ROE CORPORATIONS I )  
through XX, )

21 Defendants. )  
22 )

23 **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION**  
24 **FOR ENTRY OF FINAL JUDGMENT PURSUANT TO NRCP 54(B)**  
**AND MOTION FOR ATTORNEYS' FEES**  
25 **(Third Request)**

26 COMES NOW Plaintiff, LAS VEGAS DEVELOPMENT GROUP, LLC ("*LVDG*"), and  
27 Defendant, AZTEC FORECLOSURE CORPORATION ("*Aztec*"), by and through their  
28 undersigned counsel, and hereby stipulate and agree as follows:

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1. On January 5, 2016, prior to the date on which this matter was removed to this Court, Aztec filed a Motion for Entry of Final Judgment Pursuant to NRCP 54(b) related to an Order granting Aztec's Motion to Dismiss in the State Court. Said Motion is attached to the Joint Status Report filed herein on February 11, 2016 [Doc. #20-1].
2. On January 15, 2016, Aztec filed a Motion for Attorneys' Fees and Costs herein [Doc. #7].
3. On January 21, 2016, the parties submitted a Stipulation [Doc. #10] extending the time in which to respond to the subject Motions because they were discussing the potential amicable resolution of said Motions. The Court granted this Stipulation on February 9, 2016 [Doc. #16].
4. On February 5, 2016, the parties submitted a second Stipulation [Doc. #14] extending the time in which to respond to the subject Motions because they continued to discuss the amicable resolution of said Motions. The Court granted this Stipulation on February 9, 2016 [Doc. #17].
5. The parties continue to discuss the amicable resolution of said Motions. Various levels of authority have to approve the current proposal because of the multiple facets, including addressing the fees and costs claimed, Rule 54(b) certification and imminent appeal if no resolution is reached.
6. If resolved, the Motions will be withdrawn or an appropriate stipulation submitted. As a result, the parties believe that judicial economy will be served by a further extension of time.

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- 1           7.       LVDG shall have an additional period of time until and including March 14,  
2                       2016, in which file Responses to pending Motions.  
3           8.       Aztec shall have until and including March 28, 2016, in which to file any Replies.  
4           9.       This Stipulation is made in good faith and not for purpose of delay.

5           Dated this 19<sup>th</sup> day of February, 2016.

6       ROGER P. CROTEAU &  
7       ASSOCIATES, LTD.

WRIGHT, FINLAY & ZAK, LLP

8       /s/ Timothy E. Rhoda  
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25      Attorney for Defendant  
26      Aztec Foreclosure Corporation

27                       IT IS SO ORDERED.

28                       

RICHARD F. BOULWARE, II  
United States District Judge  
Dated: March 1, 2016.

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19<sup>th</sup> day of February, 2016, I served via the United States District Court CM/ECF electronic filing system, the foregoing **STIPULATION TO EXTEND TIME TO RESPOND TO MOTION FOR ENTRY OF FINAL JUDGMENT PURSUANT TO NRCP 54(B) AND MOTION FOR ATTORNEYS' FEES (Third Request)** to the following parties:

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